

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

PROBULK CARRIERS LIMITED,

Plaintiff,

vs.

MARVEL INTERNATIONAL
MANAGEMENT AND
TRANSPORTATION,

Defendant.

Civil Action: 14-CV-8338 (LAK)

**ATTORNEYS' STIPULATION AND AGREEMENT PURSUANT TO THE COURT'S
MEMORANDUM OPINION OF APRIL 13, 2016 and ORDER OF APRIL 20, 2016**

BY MEMORANDUM OPINION issued on April 13, 2016, the Court ordered:

1. The document subpoena is modified to require that Tolga Karacelik produce the documents at 10:00 a.m. on April 26, 2016 or such other time to which the parties agree by written stipulation filed with the Court at (a) Any place agreed upon by the parties in a written stipulation filed with the Court or, if no such stipulation is filed on or before April 19, 2016, (b) A place in Istanbul, Turkey, to be fixed by the Court by subsequent order on application by the plaintiff.
2. The deposition subpoena is modified to require that Karacelik appear for and submit to a deposition (a) Commencing on a date and at a time and place agreed upon by the parties in a written stipulation filed with the Court or, if no such stipulation is filed on or before April 19, 2016, (b) Commencing on a date and at a time and place in Istanbul, Turkey, to be fixed by the Court by subsequent order on application by the plaintiff. The deposition shall be recorded on video and, if the parties so stipulate in writing or the Court later so orders, may be conducted by video conference.

3. Karacelik shall comply with the subpoenas as modified by (a) this order and (b) written stipulations or subsequent order or orders of this Court, as the latter case may be.

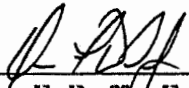
BY STIPULATION AND AGREEMENT, as So Ordered by the Court on April 20, 2016:

1. Non-party witness Tolga Karacelik was directed to produce true copies of the documents requested in the Supoena to Produce Documents at an office or place to be agreed by the undersigned attorneys in Istanbul, Turkey on or before May 13, 2016; and,
2. Non-party witness Tolga Karacelik was directed to appear at an office or place to be agreed by the undersigned attorneys in Istanbul, Turkey for a deposition on a date to be agreed, with the conditions that the deposition will take place on or before Thursday, June 30, 2016 and the deposition will be conducted via international videoconferencing.

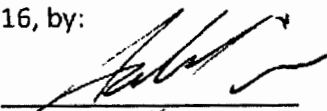
NOW, BY FURTHER STIPULATION AND AGREEMENT dated June 16, 2016, counsel for the Parties stipulate and agree that:

1. Non-party witness Tolga Karacelik did comply with the requirements of the Subpoena to Produce Documents; but,
2. The time for Non-party witness Tolga Karacelik to appear at an office or place to be agreed by the undersigned attorneys in Istanbul, Turkey for a deposition will take place on July 20, 2016 and the deposition will be conducted via international videoconferencing.

STIPULATED AND AGREED to on June 17, 2016, by:



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SO ORDERED



LEWIS A. KAPLAN, USBJ

6/22/16